

Remarks

As stated above, Applicants appreciate the Examiner's thorough examination of the subject application and request reexamination and reconsideration of the subject application in view of the preceding amendments and the following remarks.

As of the Office Action of March 17, 2010 claim 1 was pending in the subject application, of which claim 1 is an independent claim. With this response Applicants have amended claim 1 and have added claims 2-20. No new matter is believed to have been added as a result of these amendments.

As an initial matter, Applicants note the Examiner's objection to the Drawings on page 2 of the Official Action dated March 17, 2010. Applicants have attached seven replacement sheets with this amendment to address the Examiner's concerns. No further correction is believed necessary.

Applicants also note the Examiner's objection to the oath/declaration. Applicants have attached a corrected oath with this response. No further correction is believed necessary.

Applicants also note the nonstatutory obviousness type double patenting rejection. As described on page 4 of the Official Action, Applicants intend to file a terminal disclaimer upon any indication of allowable subject matter in order to overcome this rejection.

Claim 1 stands rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,321,202 issued to Raveis. Applicants respectfully traverse this rejection.

Applicants' newly amended independent claim 1 is provided below for the Examiner's convenience.

1. A computer-implemented method of determining a pathway between a source connection point and a target connection point comprising:

providing a computer system having at least one database comprising data defining entities as connection points;
defining the source connection point as a list of contacts;
defining the target connection point; and
defining a set of intermediate connection points as a series of intermediate contacts that collectively define the pathway from the source connection point to the target connection point, as a function of predetermined relationships among a superset of contacts comprising the intermediate contacts.

Support for Applicants' newly amended claim 1 may be found throughout the subject application, for example, in Figure 5, which has been provided below for the Examiner's convenience.

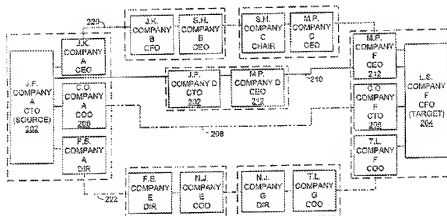


FIG. 5

A description of Figure 5 may be found in paragraphs [0063 and 0065] of the subject application, which are provided below for the Examiner's convenience.

[0063] An example connections list is schematically shown in FIG. 5. In this example, after the host database 102 and the client database 114 have been constructed, steps 22 and 24, FIG. 2, **identification information for a source party 202 and a target party 204 are input to the host operation system 102 over the internet 18 through client interface 116.** For simplicity, the entire record of each party is not shown in FIG. 5. Only the relevant identification information for the purposes of this example are shown. Upon receiving the identification information, which typically is the name of the people between whom a connection is to be determined, the records of the source party and the target party are identified in the client

and/or host databases, step 28. In this example, the source party 202 is for J.F. who is the Chief Technology Officer of Company A. The target party record 204 is for L.S., the Chief Financial Officer of Company F. In step 30, the host database 102 is searched to locate **intermediate party records** having identification information commonalities with the source party record 202. In this case, the record 206 of C.O., which indicates that C.O. has identification information including a relationship with Company A as Chief Operating Officer is located. The remaining identification information of the record of C.O. is searched to determine whether there is a commonality between any of the identification information of C.O. and any of the identification information stored in the record of the target party, L.S., step 32. There is a commonality, since the record of C.O. indicates a relationship with Company F as Chief Technology Officer, step 34. Accordingly, a list including the source party record of J.F., the intermediate party record of C.O. and the target party record of L.S. is generated and sent to the client interface 116, step 38. In the list, all of the identification information included data included in the record of each party is available to the client. *Subject application, para. [0063].*

[0065] In **FIG. 5**, each entity with which the involved parties are associated is indicated by a dashed line. Connections between entities are referred to as hops. Since no entities other than the entities associated with the source party and the target party are needed to make the connection shown by double-dotted, dashed line 208, this connection is referred to as a "one-hop" connection. Other, multiple hop connections between the source party record 202 and the target party record 204 are shown in **FIG. 5**. Line 210 shows a "two hop" connection. Using the method described above, it is determined that the record of the source party J.F., 202 indicates a relationship between Company A and Company D based on the commonality that J.F. is associated with both companies. A further search in host database 102 indicates a relationship between the record 202 of J.F. and the record 212 of M.P., based on the commonality that both parties have a relationship with Company D. The record 212 of M.P. indicates a relationship with the target record 204 of L.S., based on the commonality that both parties have a relationship with Company F. Accordingly, since one intermediate entity (Company D) is included in the connection 210, this connection is referred to as a "two-hop" connection. Three-hop connections are shown by dotted line 220 and dotted dashed line 222. In this example, if the preset limit of connections is four, in step 40, **FIG. 2**, the process would end. It will be understood that the preset limit can be set to any number, although, in order to minimize processing time and cumbersome connection lists, the limit preferably is set to no more than 10. *Subject application, para. [0065].*

In contrast, Raveis appears to disclose a system and method for managing transactions relating to *real estate*. *Raveis, Title*. On pages 3-4 of the Official Action the Examiner seems to equate the discussion of sales agents in column 8, lines 38-40 of Raveis with the limitation "defining the source connection point as a list of contacts." *Official Action pg. 6*. This section has been provided below for the Examiner's convenience.

With continuing reference to FIG. 4, a sales agent or move consultant uses the subject invention to locate data relating to a contact. *Raveis, col. 8, lines 38-40*.

Applicants respectfully disagree with the Examiner's characterization of Raveis. Specifically, it is Applicants' understanding that Raveis fails to disclose "defining the source connection point as a list of contacts." Applicants respectfully submit that Raveis appears to merely disclose a searchable database for use by various sales agents. Applicants do not understand how the existence of a sales agent could be interpreted as disclosing "defining the source connection point as a list of contacts."

Further, the Examiner seems to suggest that Raveis discloses "defining a set of intermediate connection points as a series of intermediate contacts that collectively define the pathway from the source connection point to the target connection point, as a function of predetermined relationships among a superset of contacts comprising the intermediate contacts." *Official Action, pg. 7*. The Examiner cites the discussion of real estate listings in column 10, lines 1-10 of Raveis. This section and corresponding Figures 8A and 8B have also been provided below for the Examiner's convenience.

Referring to FIG. 8a and FIG. 8b, Table 3 depicts another exemplary database stored within one of the servers 12 or 14. Namely, a record schema for a listing database, designated generally by reference numeral 300. A listing is a piece of real estate which has been offered for sale through a sales agent of the real estate company. The listing database 300 includes a

record for each listing, wherein each record contains a plurality of fields for receiving information associated with each listing. The listing database 300 stores the data necessary to identify real estate offered for sale by the real estate company.

In accordance with an embodiment of the present invention, the fields of each listing record include, inter alia, fields 351-354 containing data relating to how each record was populated with data. Fields 355-359 contain data relating to commissions associated with the listing, such as, listing commission, data relating to the type of listing commission, **selling commission**, data relating to the type of selling commission and data relating to the total real estate company commission. Data relating to original list price, date of the listing and current list price is preferably contained in fields 360-362. The remaining fields in exemplary Table 3, namely fields 363-397 contain data relating to the listing. For example, the listing records further includes a MLS identifier for the listing, instructions for the lock box at the listing, a field indicating whether or not the contact associated with the listing is a relocation contact and a field indicating what type of property the listing is. Furthermore, fields in the listing record may contain data relating to a sign vendor associated with the listing, showing instructions and directions for the listing, a zip code for the listing and an open field to include any miscellaneous comments relating to the listing. .
Raveis, cols. 9-10, lines 1-30.

351 ChangedBy	352 ChangedDate	353 EnteredBy	354 EntryDate	355 ListingCommission	356 ListingCommissionTypeCD
BHart	2/27/99	BHart	1/31/99	LG	F
JSimmons	3/15/99	BHart	8/11/99	SP	F

FIG. 8A

357 SellingCommission	359 TotalCommission	360 OriginalListPrice	361 OriginalListDate	362 CurrentListPrice
F345	16,000	332,000	3/19/99	332,000
P763	45,000	775,000	5/9/99	775,000
F337	115,090	1,325,000	4/16/00	1,325,000

FIG. 8B

Applicants respectfully submit that Raveis fails to disclose "defining a set of intermediate connection points as a series of intermediate contacts that collectively define the pathway from

the source connection point to the target connection point, as a function of predetermined relationships among a superset of contacts comprising the intermediate contacts." Specifically, Applicants do not understand how the database entries provided in Raveis could possibly teach the above limitation. Applicants again refer the Examiner to Figure 5 of the subject application provided above, which clearly depicts a " pathway from the source connection point to the target connection point, as a function of predetermined relationships among a superset of contacts comprising the intermediate contacts." Applicants respectfully submit that the database of Raveis fails to disclose a pathway as claimed in newly amended independent claim 1.

Therefore, Applicants respectfully submit that Raveis fails to disclose each and every limitation of Applicants' newly amended claim 1. As such, Applicants respectfully submit that newly amended claim 1 is in condition for allowance. Applicants note that newly added independent claims 11 has been drafted to include similar limitations to that of claim 1 and respectfully submit that claim 11 is in condition for allowance as well. Since dependent claims 2-10 and 12-20 depend, either directly or indirectly, from Applicants' independent claims 1 and 11, Applicants respectfully submit that these claims are in condition for allowance as well. Accordingly, withdrawal of the rejection to claim 1 under 35 U.S.C. § 102 is respectfully requested and an indication of allowability of claims 1-20 is earnestly solicited.

Having overcome all of the outstanding rejections, Applicants respectfully submit that the subject application is now in condition for allowance. Applicants believe that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally,

nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper.

In consideration of the amendments and foregoing discussion, the application is now believed to be in condition for allowance. Early allowance of the subject application is respectfully solicited. The Examiner is kindly invited to contact Applicants' attorney at 617-854-1460 to facilitate prosecution.

This response should not require any additional fees. However, in the event that additional fees are due, please charge or credit any refund to our Deposit Account No. 50-2324.

Respectfully Submitted,

Dated: July 19, 2010

/Mark H. Whittenberger/
Mark H. Whittenberger
Reg. No. 52,356

Holland & Knight LLP
10 St. James Avenue
Boston, MA 02116-3889
Telephone 617-854-1460
Facsimile 617-523-6850